

New Homes from Old Places

Draft Residential Conversion and Sub-Division Supplementary Planning Document

Pre Production Draft: May 2009

Statement of Consultation

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1.0 Introduction

- 1.1 This document presents the outcome of consultation on the Pre Production Draft Supplementary Planning Document “Conversion of Holiday Accommodation to Permanent Residential Use” which was published in May 2009.
- 1.2 The consultation exercise took place over a four week period between 3rd August and 31st August 2009, and was generally limited to local architectural and planning agents and holiday accommodation organisations. (See Appendix 1 for Schedule of Consultees)
- 1.3 The intention of the consultation was to obtain views on the general approach and usability of the document and as to whether the proposed design requirements were appropriate.

2.0 Summary of Consultation Responses & Key Issues Raised

- 2.1 Four consultation responses were received which are set out in Appendix 2 together with the Council’s response.

- 2.2 Whilst some of the comments welcomed the aims of the document they all had concerns with the detailed design requirements, raising a number of issues which can be summarised as follows:

Key Issues Raised

- The document is too ambitious (and prescriptive) in terms of the existing architectural features to be removed;
- The proposed internal space standards are too strict and will result in large houses (and flats) for which there is no market;
- External amenity standards cannot be met;
- The requirements are not financially viable without significant public grant aid;
- The proposals as they stand could lead to a worsening of the current situation with large properties becoming popular for large vulnerable families and the creation of further unlawful HMOs; and
- Need to understand potential and possible unintended impacts on an already weak and at-risk holiday accommodation sector.

Appendix 1: List of Agents and Organisations Consulted

Name/ Organisation
Alan Jones Chartered Surveyors
Architectural Design Services
BAGS
Baxter Homes Ltd
Bill Atkinson
Bispham Hotel & Traders Association
Blackpool Hotel and Guest House Consortium
Blackpool Self-Catering Association
Bromley Parker Architects
Bromley Parker Architects
CABE
Cassidy & Ashton
CFM Consultants
Chris Hewitt Architect
Croft Goode Partnership
D Turnbull
Deputy Director of Housing Regeneration Re:Blackpool
Firth Associates Ltd
Fletcher Smith Architects
Fylde Architects and Surveyors
Fylde Coast Housing Strategy Manager Blackpool Council
Gerald Senior
Government Office North West
Graham Anthony Consultants
Head of Business and Visitor Economy Strategy Blackpool Council
Home Plan Design
Ian Standidge
Information Monitoring Officer Blackpool Council
Julie Cary Planning
Kensington Developments

Name/ Organisation
Keystone Design Associates
Leo Morgan
Mackeith Dickinson & Partners
Maple Timber Frame
Mellor Architects
Midgely Drawing Service
Mr D Turnbull
Mr G Attwater
Mr R Ansell
Mr R Hopper
Mr S Lomax
Ms Melanie Lawrenson
NTJ Design
Partnership Delivery Officer Blackpool Council
Planning & Design Services Ltd
Plantasia
PT Design
Roy Bancroft
Thompson Developments
Turner Builders Ltd
Wilkinson Developments Ltd
Yes Hotels

List of Respondents

Name	Organisation
Mr C Plenderleith	Leith Planning Ltd
Mr S Lomax Dwent	Owner of holiday accommodation in Blackpool
David Hadwin	Keystone Design Associates Ltd
Mr R Dagwell	Blackpool Hotel & Guest House Consortium

Appendix 2: Schedule of Comments and Responses

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft
1.1	Leith Planning Ltd on behalf of Hay Hill Ltd	While it is not stated in the document it is assumed that the 'revision' is to the Supplementary Planning Guidance (SPG) Note 10 dated June 1999 entitled 'Change of Use of Holiday Accommodation and Conversion of Properties to Permanent Residential Use and Holiday Flats'.	This is correct. It is acknowledged that the text in the introduction does not explain this clearly.	The Revised Draft now clearly explains that the document will replace existing SPG Note 10.
1.2	"	It is understood that the replacement for SPG Note 10 is a Supplementary Planning Document (SPD) providing amplification in relation to Local Plan Policy RR9 as reproduced at Appendix 4. However, this is not clearly explained which undermines the integrity of the document.	The draft document consulted on was designed to gauge comments from informed agents on potential new guidance for residential conversions.	It has been agreed that the status of the document will be a SPD. This is explained in the revised draft. The document provides supplementary guidance to "Saved" Policies RR9, HN5, HN6 and relevant replacement policies in the emerging Core Strategy.
1.3	"	Not satisfied that the SPD meets the requirements of section 19 of the Planning and Compulsory Purchase Act 2004 ; in particular the Council has not given sufficient regard to the following matters, namely:	These comments relate to the "status" and procedure for preparing a SPD. A decision on the status of the eventual document had yet to be taken at the time of this consultation.	The statutory requirements for producing a SPD will be followed.
1.3a	"	(a) national policies and advice contained in guidance issued by the Secretary of State; The document needs to be tested against the provisions of Paragraph 5 and 23 of PPS1 in particular the SPD will undermine sustainable economic development by imposing standards which seriously undermine viability.	The guidance aims to create, good quality converted new homes in accordance with PPS1 and responds to national, regional & local planning policies as appropriate.	The revised draft will provide design requirements which will support creating good quality new homes through conversion.
1.3b	"	(b) any other local development document	The draft guidance is	The design requirements in the

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		which has been adopted by the authority. One of the concerns is that the document goes well beyond the scope of Local Plan Policy RR9 and is overly prescriptive. The SPD is not clearly cross-referenced to the relevant development plan document policy which it supplements.	compliant with Policy RR9, HN5 and HN6 of the Local Plan, which require proposals to comply with the Council's floorspace and amenity standards, mix, and establish residential character. They refer to producing supplementary guidance to ensure good standards of residential accommodation.	revised draft complement existing local plan policies, and these are clearly referenced in the appendix to the Draft SPD
1.3c	“	(c) the document will seriously undermine the viability of development proposals, such as that for the Verona Hotel (Tyldesley Road).	The SPD will have general applicability and is not being prepared to address a specific development proposal.	The revised draft includes a number of changes to design requirements for conversion from the earlier draft. For example, requirements for external amenity space and subdivision floorspace thresholds have been reduced. In addition, the redrafted document enables potential waiver of some requirements dependant on the merits of the case and the applicant proving the requirement to be unachievable.
1.3d	“	(d) the resources likely to be available for implementing the proposals in the document. One of the concerns is that to achieve the aspirations laid out in the Foxhall Action Area Plan the council must rely on private sector investment.	This comment relates to the Foxhall AAP and not to this SPD.	N/A
1.4	“	<i>The Town & Country Planning (Local</i>		

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		Development) (England) Regulations 2004 Reg 2(1), defines a “SPD” as “a LDD which is not a DPD, but does not include the local planning authority’s statement of community involvement”. This draws attention to the following:		
1.4a	“	(a) Regulation 13 (1): the LDD must contain a reasoned justification of the policies contained in it;	This will be set out in future drafts.	A brief justification accompanies each set of design requirements.
1.4b	“	(b) Regulation 13 (5): where a DPD contains a policy that is intended to supersede another policy, it must state that fact and identify the succeeded policy. It is assumed that the ‘revision’ is to the SPG Note 10 dated June 1999 entitled ‘Change of Use of Holiday Accommodation and Conversion of Properties to Permanent Residential Use and Holiday Flats’.	Agreed.	The revised document will state that the SPD will replace the existing SPG10.
1.4c	“	(c) Regulation 13(8): the policy in an SPD must be in conformity with: (a) the policies in the core strategy (b) the policies in any other DPD, or (c) if neither paragraph (a) nor (b) applies an old policy.	Noted.	The SPD will be in conformity with “saved” Local Plan Policies HN5, RR9, HN6 and emerging Core Strategy replacement policies.
1.4d	“	(d) Part 5 introduces minimum procedural requirements for the adoption of SPD’s, including publicity, and providing an opportunity for making representations. There are a number of subheadings and the following are of particular reference, namely: <ul style="list-style-type: none"> • application interpretation of Part 5 	At the time of this consultation no decision on the status of this document had been made. Now that it is confirmed the document will be an SPD all appropriate procedures will be followed.	Appropriate procedures will be followed when publicising the Draft SPD, including publicity and opportunity to make formal representations.

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		<ul style="list-style-type: none"> • public participation • representations on SPDs • adoption of SPDs 		
1.4e	“	(e) Regulation 19: Adoption of SPDs lists the steps to be taken by the local planning authority once the SPD has been adopted. This includes sending the adoption statement to any person who has asked to be notified of the adoption of the document (Reg 19(c)). Leith Planning wishes to be notified in accordance with Reg 19(c).	Noted	The statement of matters to be published at the commencement of the formal consultation on the draft SPD will allow respondents to request to be notified of the adoption of the SPD.
1.5	“	Para 6.1 of PPS 12: Local Spatial Planning notes that a SPD may be prepared to provide greater detail of the policies in its DPDs. The document goes well beyond the scope of Local Plan Policy RR9 and is overly prescriptive. PPS12 goes onto state that SPDs should not be prepared with the aim of avoiding the need for the examination of policy which should be examined. The preclusion of 1-bed accommodation and setting out living space standards as stipulated at Table 1 (which includes minimum total dwelling sizes of 67sq.m. for a 2 bed flat) would seriously undermine viability of re-development schemes. If the Council intend to rely on the policy framework it should be subject to the rigorous assessment associated with a DPD.	<p>Policy RR9 states that <i>Permanent residential accommodation will only be permitted where proposals comply with the Council's floorspace and amenity standards.</i></p> <p>Policy HN5 states inter alia that <i>Proposals for the sub-division and/or change of use of existing buildings for residential use will be permitted providing units are all fully self-contained and satisfy the Council's floorspace and amenity standards.</i></p> <p>Para 5.36 of the supporting text for Policy HN5 states that <i>“All future applications for</i></p>	N/A

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			<p><i>conversion to residential use will need to accord with Policy HN6 requiring a mix of housing and with the Council's <u>Supplementary Planning Guidance for residential conversions and sub-divisions</u>. The Guidance sets out the Council's standards for accommodation including floorspace, layout, amenity space and parking standards and ensures any changes to residential use result in good quality self-contained living accommodation"</i></p> <p>The new SPD will update the current SPG referred to.</p>	
1.6	"	The following comments are drafted by Rob Newman		
1.6a	"	<i>(a) Floor space standards:</i> Minimum gross floor area of a 2 bedroom flat to be 67sqm but total minimum floor space sizes for individual rooms is 47sqm. Where does the other 20sqm fit in? And why could a 200sqm guest house not be sub-divided into 2 or 3 two bedroom units?	The additional 20sq.m is taken up by ancillary spaces such as bathrooms and circulation space.	The thresholds below which sub-division will not be permitted have been revised.
1.6b	"	<i>(b) External amenity provision:</i> The majority of 200sqm plus guest houses could not provide the amenity area standards for garden, parking and bin storage required, therefore, does this	The document is draft and has been published for comment. Consideration will be given as to whether the external amenity provision required is	The external amenity standards have been revised.

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		mean that some of the larger ones would not be able to be sub-divided?	achievable.	
1.6c	"	<i>(c) Amenity:</i> In some cases due to the density of the buildings and limited external space, the external amenity requirements could not be achieved even for 1 dwelling.	The document is draft and has been published for comment. Consideration will be given as to whether amenity requirements are achievable.	See above (1.6b)
1.6d	"	<i>(d) Large Single dwellings:</i> Should this be the case, would there not be a predominance of very large single dwellings which would be attractive to the Housing Associations for very large families, possibly causing some of the social problems trying to be addressed in this document?	One of the aims of the document is to encourage a more sustainable mix of housing types and tenures as the current supply is skewed in favour of privately rented small flats.	The threshold below which properties can be sub-divided to two properties has been revised to 156sq.m. An additional threshold for sub-division to more than two properties has been introduced at 191sq.m.
1.6e	"	<i>Investment:</i> Investment in any of these properties by a potential developer is disproportionate to any return made by a single dwelling, especially when you consider the cost of removing roof lifts and reinstating original roof lines etc. This will have the effect of stagnating the existing guest house market.	Noted.	The requirements for removal of existing features will only require the minimum considered necessary to establish appropriate residential character and amenity.
2.1	David Hadwin Keystone Design Associates Ltd	The existing policy is working fine and understood by all parties. It is robust and has been supported in appeal. Why the wholesale change in the policy? It is to be applauded that the planning section is now echoing the mood and policy of the general council i.e. acknowledgement that the guest house industry of Blackpool is in serious decline.	There is a need to respond to the significant changes affecting the holiday accommodation sector in Blackpool. This document starts to develop design guidance which will achieve high quality conversions & reduce problematic small flats /	N/A

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			HMOs.	
2.2	"	Local plan policy will need to be changed to reflect the aspirations of this document (RR9 in particular).	See response to 1.3b and 1.5 above.	N/A
2.3	"	Would be useful to know which areas are being considered as holiday resort areas. Need to look at the general condition of stock in the areas. In the Foxhall (Preferred Option) consultation document one of the areas proposed for retention is Coop Street, but all the properties in this area are of low structural condition. In these areas conservation seems pointless, when replacement with alternative uses would be far better.	The holiday resort areas will be developed through the Core Strategy.	N/A. The holiday resort areas are shown in a separate appendix to the Core Strategy Draft Preferred Option, which will be consulted on. A separate SPD dealing specifically with holiday areas is being developed.
2.4	"	The use of floor areas to assess the suitability for conversion is flawed. The measurement is subjective. The 200sqm minimum floor area conflicts with the size of flat suggested. A two bedroom flat has a floor area requirement of 67sqm. If this figure is used it is possible to convert the 200sqm building into 3no flats. A 200sqm building would provide a very large family dwelling, which is not a desirable product.	Noted. The proposed floor area thresholds and standards will be revisited.	Room size standards and the accommodation conversion scale have been revised, e.g. an original property greater than 191sqm can now be divided into 2+ dwellings.
2.5	"	No consideration has gone into economics of conversion. The council must recognise that all these buildings are commercial, so they must work financially. If they do not, the owner goes bankrupt, and the property becomes vacant and falls into disrepair.		The guidance will only apply to existing commercial premises seeking to convert to residential use to ensure that such conversions are consistent with the Council's housing, planning,

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		The majority of the hotel stock in Blackpool is currently up for sale. Market forces will determine what conversion is viable and will result in mixed development that is desired.		regeneration and economic development policy objectives.
2.6	"	Step 2: Why is only 50% of roof space included in the assessed floor area of the (original) building?	The 50% roof space assessment was an attempt to bring the measurable roof space in line with the original roof area.	This requirement has been replaced with a requirement that any space with a floor to ceiling height of less than 2.2m cannot be included in the floor area of the original property.
2.7	"	Step 4.1 states single bedroom dwellings are not permitted in guest house conversions. This conflicts with council policy which allows 33%.	This draft document starts to reduce opportunities for problematic small flats and HMOs. Consideration will be given as to whether the requirements are too restrictive.	This has been replaced with a requirement that the maximum proportion of one bedroom dwellings in any development is 1 in 4.
2.8	"	Step 4.4 prohibits the conversion of basements. Why? These can be used for plant rooms or habitable space providing adequate amenities, and could be part of a maisonette. This requirement should be dropped.	This draft document starts to reduce opportunities for lower quality conversions with inadequate amenity.	This specific prohibition has been removed from the document.
2.9	"	Step 4.5 requires compliance with code for sustainable homes (min level 2). There is no requirement in any legislation to register with code for sustainable homes. Indeed if you are considering energy efficiency the requirements of part L1 B are adequate. It would be impractical in a conversion to meet the requirements of	This draft document starts to present opportunities for higher quality conversions with the introduction of compliance with 'Code for Sustainable Homes'. Consideration will be given as to whether this requirement is realistic to insist	The requirement for compliance with 'Code for Sustainable Homes' standards has been removed and the document now relies on the increasing requirements of Building Regulations over the life of the document to cover the

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		the code, not least the insulation levels. Incidentally the requirement conflicts with RSL and government requirements for social housing which requires code 3 level or above. Code for sustainable homes is very much detailed design and is certified on completion of the build. How is it proposed to intermesh this into the planning process? This is unworkable and unenforceable and should be dropped.	on.	performance requirements.
2.10	"	Step 4.7 requires kitchens to have windows. This is not necessary as kitchens are secondary habitable rooms akin to bathrooms. Building Regulations do not require a window to be provided to kitchens. In many conversions it is not practical to provide an external window to kitchens. This requirement should be dropped.	See 2.8 above	The requirement for direct daylight has been removed.
2.11	"	Step: 4.8 (all dwellings must fully comply with all relevant Building Regulations) conflicts with the above points.	Potential conflicts with Building Regulations will be resolved.	See above response to 2.10.

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2.12	"	The minimum sizes as quoted in step 06 are excessive. A large two bedroom flat has a floor area of 60sqm. If you apply minimum room sizes given in this section it is possible to have a two bedroom flat of less than 50sqm. Similarly, applying this guide to the storage requirements of 5% would mean a dwelling of 5 bedrooms would require storage space greater than the kitchen and bathroom combined. It is suggested that the room sizes in the current guideline are retained and the minimum flat sizes no used. As with storage, this should be a suggestion that consideration is given to appropriate levels. This section of the guide is over prescriptive. This comment applies to minimum dimensions quoted.	The discrepancy between the aggregate figure for room sizes and total dwelling size is a result of from leaving out circulation space and bathrooms. The statement that 5% storage figure for a 5 bed flat would be more than the kitchen and bathroom combined is incorrect. There are no specific requirements for kitchen and bathroom areas in this document but guidance available nationally would provide a far higher figure than the 6.05sqm that results from the storage calculation.	Room size standards and the accommodation conversion scale have been revised, e.g. an original property greater than 191sqm can now be divided into 2+ dwellings. Dwelling size standards are based on English Partnership Standards and HCA standards along with research into adequate size standards for dwellings carried out for the GLA.
2.13	"	Step 7: 'open spaces' is completely impractical and does not take into consideration the potential stock. The space requirements in town centre are unachievable. Similarly the parking space sizes given conflict with other council policy and the disabled space sizes conflict with Part M of the Building Regulations. Also the bin space requirements conflict with advice given by the waste manager. Most Flats utilise SITA bins.	External space and parking standards will be revisited.	The private external amenity space requirement has been revised. Building Regulations do not cover parking standards for dwellings.
2.14	"	Disagree with cycle storage provision. Should be 1 per flat and space of 2.0m length is excessive.	The document as consulted on required a single space per flat and was set at 2.0m minimum	The dimensions are unchanged. Cycle storage requirements have been set to dwelling

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			length to accommodate an adult size bicycle.	occupancy.
2.15	”	In conclusion, the proposed guide is over prescriptive, conflicts with current policies and other regulations and is impractical.	There is no identified conflict with current policies or guidance.	Changes have been made to the document following responses received.
3.1	Mr Sybaris Lomax-Dwent	Step 4: A blanket ban on basement conversion is wrong. Many properties on Charnley Road and Havelock St for example have steps going down to the basement at the front, with natural daylight and are ground level at the back. These could make superb quality basement flats.	See 2.8 response	See 2.8 response
3.2	”	Step 5: The sentiment of the proposal is correct, but the financial implications would make many projects unviable. The cost of removing dormers and sun lounges in conjunction with a property renovation in many cases simply does not stack up. This is where the plan may fall down when seeking private investors/home owners to heavily invest in a tired building, rejuvenate it and be left with a hefty loss or negative equity. Blackpool housing stock is cheap, particularly failing guest house accommodation.	See 1.6e response	See 1.6e response
3.3	”	Step 7: Flexibility must be given here, we are not dealing with new builds and have to work around and to the best of what we have, so for a garden to be rejected because it is too narrow at one point is too rigid for success.	See 2.13 response	See 2.13 response

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4.1	Mr Ray Dagwell Blackpool Hotel and Guest House Consortium	The decline in visitor numbers is only one of the reasons hotels and guest houses have failed. Council policy is as much to blame for the current problems.	There is a need to respond to the significant changes affecting guest houses in Blackpool. The Council is looking to alter this policy through the emerging Core Strategy and SPD.	N/A
4.2	”	The granting of planning permission to Travelodges has only exacerbated the situation.	This document only provides guidance on the conversion of existing properties to create residential accommodation and does not cover the Council's policy on new holiday accommodation.	N/A
4.3	”	Owners try to survive by taking in anybody to pay the overheads and over the years a lack of sustained and proper enforcement has meant that areas have deteriorated and declined. This, coupled with a lack of investment in the buildings, has also led to further decay and decline making streets and areas an HMO haven.	See 4.2 above. This draft document starts to reduce opportunities for problematic small flats and HMOs by imposing more stringent design requirements.	N/A
4.4	”	This lack of investment is not just the private sector but also the Council's own buildings, some of which are in the holiday areas and are a disgrace. The Council has failed to enforce the legislation that they have available. This approach is unacceptable.	Comments noted. The Council's MIPS Team are undertaking surveys to identify poor quality property and will take appropriate enforcement action.	N/A
4.5	”	The use of hotels and holiday flats for permanent residents has led to more anti social behaviour in the surrounding	The Council's MIPS Team is aware of these problems and is seeking to carry out	N/A

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		streets. Where permanent and visitors are in the same building this has led to further problems.	appropriate enforcement action to tackle unlawful uses and to address the problems of anti social behaviour.	
4.6	"	The deregistering of hotels has been made difficult and even those that "cease trading" still take in guests.	The emerging Core Strategy and the revised SPD will allow unviable guest houses located outside of the revised core holiday areas to convert to permanent residential use. The Council will consider appropriate enforcement action against owners of properties which change use under this new policy regime, but continue to take in guests.	N/A
4.7	"	A view should be taken on what you do with a 10 bed guest house and its proposed use. Perhaps areas should be re designated to office areas with suitable inducements e.g. to form streets of estate agents etc. thereby freeing up town centre areas such as Birley Street to café's etc. The hard and fast rules on holiday area and residential are not necessary as there is no reason why a mixture of uses in the same street cannot coexist side by side e.g. offices, residential homes and hotels. This would depend obviously on occupancy.	The Council will consider appropriate proposals for mixed use conversion of existing holiday accommodation located outside the revised core holiday areas. Such applications will be considered on their merits, against other relevant saved local plan policies and emerging LDF policies, and subject to impact on residential amenity/ car parking etc.	N/A
4.8	"	The practice the Council has taken in putting dysfunctional families in Hotel	Comments noted. The Council through its work in preparing	N/A

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		areas have led to further and ongoing anti social behaviour. Before any policy document of this type is brought forward, an in-depth study of the social and economic fabric of the area, the amount of deprivation, and the employment prospects of the area, should be undertaken.	evidence base for three Area Action Plans, and the survey work by MIPS, has a good understanding of the key inner neighbourhoods social and economic issues and opportunities.	
4.9	”	It is pointless creating more homes without job creation going side by side. Without job creation the houses will not be sold.	This is beyond the scope of the SPD and is a matter for the Core Strategy and Neighbourhood Plans to address.	N/A
4.10	”	Step 1: There is no real justifiable reason why residential and hotels cannot coexist side by side in certain areas. The main objection to that approach would be the Promenade. This must be coupled with the degree and the long term proposals for areas. If more Travelodges are given planning approval (it is rumoured that at least two more are earmarked for Blackpool) then more hotels even those on the Promenade will become empty	See 4.2 & 4.7 above	N/A
4.11	”	If hotels are to be developed at the football ground then more hotels will fail. The hotel market is already in decline with some premises being on the market for several years. The market has further declined due to the present economic climate and the downturn is probably pro rata with the national failure and decline in the sale of hotels. Even with the redrawing of maps	See 4.2 & 4.6 above	N/A

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		for designated holiday areas, if hotels are not wanted and cannot be sold, they should be automatically deregistered and a formal legally binding agreement or undertaking being signed. If the premises are converted at a later date controls will prevent it from becoming an HMO.		
4.12	"	Step 2: The method of measuring will depend on all extensions being removed e.g. sun lounges. Any height below 5ft on a roof lift to be excluded, not 50%. Any area outside to be excluded agreed.	See 2.6 above	See 2.6 above
4.13	"	Step 3: Our present houses have probably the smallest floor area in Europe and larger dwellinghouses and room sizes should become the norm not the exception. The old Parker Morris standard should be used.	One of the aims of the document is to encourage a shift to quality residential neighbourhoods with larger "family" homes and apartments.	N/A
4.14	"	Step 4: To control this by planning law and appeals is virtually impossible. This will only cause more illegal HMOs.	The requirements set out in the draft SPD are intended to minimise the potential for new HMOs. The Council will use appropriate enforcement action to tackle unlawful HMO development as part of a co-ordinated approach.	N/A
4.15	"	Step 5: The removal of the sun lounge is not necessary. Signs and awnings to be removed – agree; roof lifts to be removed – disagree. Replacing extensions with gardens will depend on each building. A feasibility study on the cost of carrying out	The Council will consider the technical feasibility requirements of the SPD.	

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		these works is required. This is a blanket policy which is impractical to enforce on. As this document unfolds and if this becomes the firm policy it will create planning blight, the destruction of the sale of hotels and more illegal HMOs to which the Council cannot and has not controlled in the past.		
4.16	"	Step 6: We have the smallest dwellings and room size in Europe and therefore have no objections on dwelling size and room size	Noted – see 4.13	See 2.12 above
4.17	"	Step 7: The external space requirement is impractical. It is obvious that this document has been drawn together by people with no idea of the hotel and street layouts. It appears that they have look at the front elevations without looking at the rear. Hotels are bounded by back access roads making it almost impossible to park cars let alone rubbish bins and bike parks. Please get real.	The Council will consider the technical feasibility requirements of the SPD.	The external space standards have been revised and flexibility introduced.
4.18	"	General Comments: The purpose in theory is to give guidance on the change of use of Hotels / Guest Houses to residential housing. In practice it will destroy the housing market and cause planning blight. What price will these hotels change hands for when so much is required e.g. the removal of roof lifts, extensions (outriggers). No cost analysis has been carried out. Who will pay the price for converted houses?	The Council will consider the technical feasibility requirements of the SPD.	

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4.19	"	To enable this to go ahead 100% grants would be required not 70% but 100%.		The document has been revised to provide greater flexibility. In particular, guest house owners simply looking to convert to permanent residential use will have fewer requirements to meet.
4.20	"	Who would want to live in a house next to a hotel or vice versa? Although a street mix of residential, hotels & offices should create no problem. Hotels that are in desperate straits will look at this and then take in residents on a long term basis (HMO), just to survive.	Comment noted. As part of the emerging Core Strategy Policy the Council would expect those guest houses and hotels remaining in business outside the core holiday areas to be viable and well managed. The Council's MIPS Team will continue to enforce unlawful HMOs and poor housing standards. The Council will also work through its Reassurance Plus Teams to address problems of anti social behaviour.	N/A
4.21	"	How is the Council going to enforce this document? Complaints have been made for 2 years against some premises and the situation has not changed or improved.	The Council has established a multi agency intervention enforcement team to address unlawful HMOs	Potential enforcement actions by the Council are referred to in the revised document.
4.22	"	This document is a typical planning dream like many other dreams for Blackpool.	This document must be viewed as part of a comprehensive strategy by the Council (as set out in the emerging Core Strategy and the adopted Housing Statement 2009-2012) to address the declining	N/A

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			holiday accommodation sector, and poor quality rented housing sector. It is intended that the document will bring about significant improvements to the quality of residential conversions and sub division in the inner areas and throughout Blackpool	
4.23	"	The Council needs to start with the licensing of Hotels and Guest Houses with the formation of byelaws to enforce and drive out all sub-standard units.	See 4.22 above	N/A
4.24	"	A working party of interested parties should be set up under a forum so that standards can be set and proper enforcement action taken.	See 4.22 above	N/A
4.25	"	To enable these units then to be sold on the open market at realistic prices then jobs must be found employment increase with the attraction of industry to the area.	See 4.9 above	N/A
4.26	"	Blackpool at the moment especially in bedsit land is full of drunks etc with anti social behaviour being the norm. Is the change from hotels to housing the only way forward?	See 4.22 above	N/A
4.27	"	The methods are impractical and the following need to be answered: - How is this document going to be enforced?	The Council's MIPS Team will enforce the requirements of the document	See 4.21 above
		- How has the cost analysis been undertaken?	The Council will consider the technical feasibility	

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft
			requirements of the SPD.	
		- Impact analysis on the housing markets?	It is intended that the document together with other emerging policies and interventions will assist in the establishment of a higher quality and balanced residential offer in Blackpool's inner areas.	N/A
		- Who are the prospective purchasers of the converted properties?	It is hoped that local people and newcomers attracted to the emerging residential neighbourhoods and the niche housing offer.	N/A
		- Are we talking of the Council purchasing all hotels and providing social housing?	No, it is intended that a more balanced residential market will result with a higher level of owner occupancy, more family homes, and larger flats and apartments	N/A
		- What is the demand for flats in Blackpool? Where are the statistics to show the demand and the potential demand with population spread?	One of the aims of the SPD is to reduce the number of small poor quality flats, particularly in the inner neighbourhoods. A recent Council study has found that there is demand for a new residential offer in Blackpool's inner resorts, subject to complementary improvements in environmental quality.	N/A
		- What grants will be available for the conversion?	There are no proposals at present to offer grants for	N/A

Ref	Name / Organisation	Summary of Comment	Response	Change to Revised Draft
			residential conversions.	
4.28	"	The Council has failed the holiday areas with its lack of action. Section 215 of The Town & Country Planning Act 1990 is hardly if ever used. HMOs are all over the place.	See 4.22 above	N/A
4.29	"	The multi party inspection team has not solved the problem. A long term strategic document with enforcement powers to include S215 needs to be drawn up.	See 4.22 above	N/A
4.30	"	Overall this is a badly thought out document and needs to be completely re-written.	Comments noted. The document was intended to obtain the views of interested organisations on a radical step change approach improving the quality of residential conversion of guest houses. The document was not badly thought out, but it is accepted that the approach and structure could be made simpler to follow, and the design requirements less onerous.	The document has been re written as a formal SPD with distinct design statements which are intended to simplify the policy and design standards required.